

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR PRESIDENT,)	CIVIL ACTION No. 2-20-cv-966
INC.; GLENN THOMPSON; MIKE KELLY;)	
JOHN JOYCE; GUY RESCHENTHALER;)	
REPUBLICAN NATIONAL COMMITTEE;)	
MELANIE STRINGHILL PATTERSON; and)	
CLAYTON DAVID SHOW,)	
)	
Plaintiffs,)	
)	
v.)	
)	
KATHY BOOCKVAR, in her capacity as)	
Secretary of the Commonwealth of)	
Pennsylvania; <i>et al.</i> ,)	
)	
Defendants.)	

**DECLARATION OF JACQUELYN BONOMO IN SUPPORT OF RULE 24 MOTION TO
INTERVENE AS A DEFENDANT BY CITIZENS FOR PENNSYLVANIA’S FUTURE**

I, Jacquelyn Bonomo, declare as follows

1. I am over the age of 18, make this declaration from my personal knowledge, and if called upon to do so, could and would competently testify to the matters set forth herein in a court of law.

2. I am the Chief Executive Officer and President of Citizens for Pennsylvania's Future ("PennFuture"). I have served in this capacity since October 27, 2017.

3. PennFuture is a 501(c)(3) non-profit, nonpartisan advocacy organization incorporated and headquartered in Pennsylvania. Founded in 1998, PennFuture advocates for just environmental policies that protect the air, land, and water in Pennsylvania by engaging in legal, regulatory, and legislative advocacy; engaging with, educating, and elevating communities on a variety of environmental issues; leading the transition to a clean energy economy; and working to promote civic engagement among Pennsylvanians, including through programs focused on increasing voter participation in traditionally underrepresented communities and environmental justice communities.

4. PennFuture has offices and staff in Harrisburg, Philadelphia, Pittsburgh, Mount Pocono, and Erie.

5. PennFuture is the state affiliate of the National Wildlife Federation and is a strategic partner of the Conservation Voters of Pennsylvania. PennFuture is also the state lead for the Choose Clean Water Coalition and the Coalition for the Delaware River Watershed, is a member of the Growing Greener Coalition and the Clean Power Coalition, and works with the Fair Districts PA Coalition and Pennsylvania Voice.

6. PennFuture serves more than 915 members, the majority of whom are located throughout Pennsylvania, including many registered and eligible voters.

7. A core part of PennFuture's mission is to engage in efforts to empower traditionally underrepresented communities to implement positive environmental change in the state through the electoral process. PennFuture works to achieve this goal through voter education, outreach, and registration programs focused on these communities, and advocacy focused on easing the burdens on voting.

8. PennFuture's voter education programs have included hosting candidate forums and an earlier iteration of the program provided voter guides in coalition with other organizations, including Pennsylvania Voice. PennFuture presently has a budget of \$93,400 for radio and digital advertisements targeted at Black and Latinx communities in Pennsylvania encouraging people to register to vote. Earlier in 2020, PennFuture commissioned an art piece in Allentown, Pennsylvania displaying a message in Spanish encouraging community members to register to vote.

9. PennFuture currently employs two staff members who work on voter engagement issues, one part-time. The organization presently pays four contract employees who are tasked with reaching out to eligible Pennsylvanians reminding them to register to vote, with plans to hire seven more phone bankers in the coming weeks. PennFuture's plan for 2020, conceived of in 2019, includes a budget for 45 full-time contract employees working on voter engagement and voter registration throughout Pennsylvania leading up to the 2020 election. That scope of that plan has been altered because of Covid-19, but it remains an important part of PennFuture's work.

10. Through these efforts, PennFuture's plan for the 2020 General Election includes an outreach goal of reaching at least 50,000 eligible Pennsylvania voters and registering at least 500 new voters prior to the election.

11. In light of the current Covid-19 pandemic, PennFuture believes that voter registration and increasing eligible Pennsylvanians' access and ability to cast their ballots by mail are the two most important issues in effectuating PennFuture's goal of increasing voter turnout among historically underrepresented communities in the 2020 General Election. PennFuture believes the most important way to increase turnout this year is to encourage voters to vote by mail. That is why a focus of PennFuture staff members, phone banker contractors, and other volunteers' outreach efforts will be to educate voters about requesting and casting their ballot by mail in the 2020 General Election. In addition, PennFuture is presently fundraising to increase its ability to effectively educate and advocate for Pennsylvanians to vote-by-mail within the state in light of the pandemic and public health concerns raised by in-person voting.

12. PennFuture also engages in advocacy efforts to lessen the burdens on Pennsylvania voters to cast their ballots. For example, in 2019, PennFuture successfully lobbied the Pennsylvania General Assembly for the passage of Act 77, one of the pieces of legislation challenged by the Plaintiffs here, which allowed for no-excuse vote-by-mail, significantly eased the burden of casting a ballot by mail, and extended the deadline to register to vote from 30 days to 15 days before the election. PennFuture's advocacy efforts are not limited to the Pennsylvania General Assembly, but also extend to local officials as well.

13. PennFuture has policy differences from state and local officials with respect to how to make the November 2020 General Election safer for voters. As one example, PennFuture believes that the state should adopt a universal vote-by-mail system in which all registered voters would receive a mail ballot and has drafted an op-ed (to be published in the future) in support of that system. To date, none of the Defendants in this action have indicated that they intend to adopt a universal-vote-by-mail system.

14. PennFuture also has regular disagreements with elected and appointed state and local officials, including Democratic officials such as Governor Wolf, including with respect to petrochemical industry subsidies and storm water regulations. For example, PennFuture has been involved in four legal actions against the state Department of Environmental Protection within the last seven years.

15. PennFuture's interests would be directly and significantly impacted if the Plaintiffs in this lawsuit prevail in their efforts to curtail the ability of voters to cast their votes by mail. PennFuture would be forced to divert resources to develop and execute new plans to educate voters as to the availability of vote-by-mail, assist voters to apply to vote-by-mail and how to return their mail ballots, and reconfigure its nonpartisan voter participation program to place additional emphasis on in-person election day voting, all while Pennsylvania scrambles to develop adequate protections for in-person voters – which the state has failed to do to date. In addition, PennFuture would have to changes its plans to focus on advocating for alternative measures to protect voter safety at the polls.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 19th day of July, 2020.


Jacquelyn Bonomo (Jul 19, 2020 23:55 EDT)

Jacquelyn Bonomo